# BEFORE THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA

### DOCKET NO. 2007-187-C

IN RE	Level 3 Communications, LLC )	PETITION TO
	Tariff revisions regarding switched access rates )	INTERVENE
	)	

The South Carolina Telephone Coalition ("SCTC") respectfully submits the within Petition to Intervene in the above-referenced docket. In support of its Petition, SCTC would respectfully show unto this honorable Commission:

- 1. SCTC is a coalition of incumbent local exchange telephone companies organized and doing business under the laws of the State of South Carolina. SCTC's members are telephone companies or telephone cooperatives subject to the jurisdiction of this Commission. A number of the SCTC companies are intraLATA toll providers. In addition, a number of the SCTC member companies have affiliates that provide interLATA toll service.
- 2. Counsel for SCTC received via email from the Commission a Notice of Filing and Hearing dated May 31, 2007, establishing a return date of July 2, 2007, for persons wishing to participate as parties of record in the above-referenced docket. Counsel for SCTC also received via email from the Commission a Notice of Hearing, also dated May 31, 2007, that does not make reference to a return date for this docket. SCTC believes this Petition to Intervene is timely; however, to the extent there is any question concerning the timeliness of the Petition, SCTC respectfully requests that this Petition to Intervene be considered and granted out of time. SCTC only recently became aware of Level 3's tariff filing and its potential impact on SCTC's member companies. Furthermore, the hearing on this matter is currently scheduled for September 6, 2007,

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and this Petition to Intervene is being filed in sufficient time so as not to cause prejudice to other parties to this proceeding.

- 3. SCTC seeks to intervene in this proceeding with full rights to participate as a party of record in so far as its interests might appear.
- 4. SCTC member companies and their affiliates are local exchange and interexchange carriers operating in South Carolina. SCTC member companies and their affiliates, therefore, are purchasers or potential purchasers of intrastate switched access services from Level 3 Communications, LLC and similarly situated carriers. SCTC has a continuing interest in the reasonableness of intrastate switched access rates of carriers from whom it purchases, or may be required to purchase in the future, intrastate switched access services, and in the manner in which intrastate switched access rates are set by such carriers. SCTC has a direct and substantial interest in this proceeding and the impact it could have on its member companies and their affiliates. SCTC's position is that its member companies and their affiliates will be directly impacted by the outcome of the proceeding as purchasers and potential purchasers of intrastate switched access services from Level 3 Communications, LLC and similarly situated carriers, and SCTC's participation in this proceeding will help insure a full and fair consideration of the issues involved.
- 5. Correspondence and communications to SCTC with respect to this proceeding should be directed to the undersigned counsel.

WHEREFORE, the South Carolina Telephone Coalition respectfully requests that this honorable Commission permit its intervention in this proceeding as its interests might appear.

## Respectfully submitted,

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ATTORNEYS FOR THE SOUTH CAROLINA TELEPHONE COALITION

Columbia, South Carolina

June 6, 2007

## BEFORE THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA

## DOCKET NO. 2007-187-C

IN RE	Level 3 Communications, LLC )	CERTIFICATE
	Tariff revisions regarding switched access rates )	OF SERVICE
	)	

This is to certify that I, Rebecca W. Martin, an employee with the McNair Law Firm, P. A., have this date served one (1) copy of a Petition to Intervene in the above-referenced matter to the persons named below by causing said copy to be deposited with the United States Postal Service, first class postage prepaid and affixed thereto, and addressed as shown below.

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June 6, 2007

Columbia, SC